

UNITED STATES DISTRICT COURT  
for the  
WESTERN District of TEXAS

United States of America )  
v. )  
JAMES COLLEY ) Case No. SA-23-MJ- 1709  
)  
)  
)  
)  
)

*Defendant(s)*

**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of December 11, 2023 in the county of Bexar in the  
Western District of Texas, the defendant(s) violated:

*Code Section*

*Offense Description*

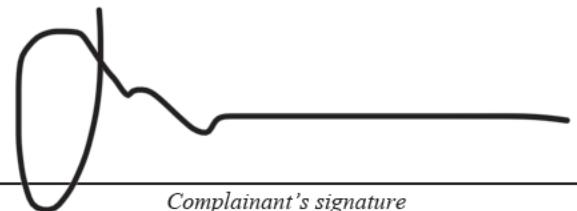
21 U.S.C. § 841(a)(1) and (b) (1)(A) Possession with Intent to Distribute a Controlled Substance.

Penalties: 10 Years to Life Imprisonment; \$10 Million Fine; Minimum 5 Years Supervised Release; and \$100 Mandatory Special Assessment

This criminal complaint is based on these facts:

See attached affidavit

Continued on the attached sheet.



*Complainant's signature*

SA Daniel Woelfel, DEA

*Printed name and title*



*Judge's signature*

Date: 12/12/2023

City and state: San Antonio, Texas

Richard B. Farrer, U.S. Magistrate Judge

*Printed name and title*

**UNITED STATES DISTRICT COURT**  
**WESTERN DISTRICT OF TEXAS**  
**SAN ANTONIO DIVISION**

I, Daniel Woelfel, Special Agent with the Drug Enforcement Administration, having been duly sworn, do depose and state the following:

1. I am a Special Agent with the DEA and have been so employed since March 2021. I am currently assigned to the DEA San Antonio District Office, Group D-51, Organized Crime Drug Enforcement Task Force Strike Force. I am knowledgeable of the way drug traffickers distribute controlled substances, and collect, transport, and distribute monies derived from drug sales. I have gained special training in the investigation of drug trafficking organizations and drug trafficking patterns and techniques not only with DEA, but also my four years of being a federal officer with U.S. Customs and Border Protection. I have participated in investigations involving the interception of wire and text messages. I am familiar with the ways in which methamphetamine, heroin, ecstasy, and marijuana traffickers conduct their business, including, but not limited to, their methods of importing and distributing controlled substances, their use of cellular telephone and short communication service (SMS) / text message, or electronic communication devices and their use of numerical codes and code words to conduct their transactions.
2. I am familiar with the facts and circumstances of this investigation because of my personal participation in the investigation referred to in this affidavit. I have compiled information derived from numerous discussions with experienced law enforcement officers. I have not included every known fact in this investigation, rather only these facts necessary to establish probable cause.
3. In January 2023 the DEA received information that James COLLEY a resident of San Antonio, Texas, is a drug distributor.
4. On December 11, 2023, agents and officers conducted surveillance on COLLEY. At approximately 11:15 a.m., while conducting surveillances Agents witnessed COLLEY depart his residence in San Antonio, Texas, within the Western District of Texas. COLLEY was seen driving a white Audi A4. A check of law enforcement databases confirmed the vehicle was registered to COLLEY. Agents maintained surveillance of the Audi until the arrest was executed.
5. On December 11, 2023, at approximately 11:30 a.m., DEA agents and SAPD marked units arrested COLLEY driving the white Audi A4, for an outstanding warrant for a violation of COLLEY's state probation, supervised by Bexar County Community Supervision and Corrections Department. SA Woelfel read COLLEY his Miranda rights as witnessed by SA Lloyd. COLLEY provided an oral waiver of his Miranda rights and chose to speak with DEA. SA Woelfel asked COLLEY if there was any weapons or drugs in the vehicle, and COLLEY admitted to their being crystal methamphetamine located in a box in the back seat. COLLEY

gave agents written consent to search his vehicle. SA Woelfel conducted a search of the vehicle and located one easily accessible box with multiple small bundles of a crystal-like substance behind the front passenger seat of the vehicle, weighing 1,065 grams (approximate gross weight).

6. COLLEY agreed in writing and orally to a consent search of his residence in San Antonio, Texas. Agents found one clear baggie containing a crystal-like substance that subsequently field tested positive for methamphetamine, weighing approximately 143 grams (approximate gross weight) located in the garage in a green toolbox. Agents also discovered one clear baggie containing crystal-like substance weighing 210 grams (approximate gross weight) located in the garage, next to COLLEY's bed in the dresser drawer by COLLEY's bed. Agents found three firearms located in the garage, one shotgun in the attic, one pistol in the dresser drawer, and one rifle located under COLLEY's bed. A scale used to weigh crystal methamphetamine was located next to COLLEY's bed. Agents located 15 bundle wrappings with methamphetamine residue in the garage. COLLEY admitted to possessing the firearms, crystal methamphetamine, scale, and bundle wrappings located in the garage.
7. The amount of methamphetamine, which is more than 500 grams of a mixture or substance of methamphetamine, infers the intent to distribute.
8. Based on the above facts, you affiant believes there is probable cause that James Colley committed the offices of Possession with Intent to Distribute a Controlled Substance, to wit, 500 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule 1 controlled substance, in violation of Title 21 U.S.C. § 841 (a)(1) and(b)(1)(A).



---

Daniel Woelfel, Special Agent  
Drug Enforcement Administration

Submitted by reliable electronic means, sworn to, signature attested telephonically per Fed.R.Crim.P. 4.1, and probable cause found:



---

RICHARD B. FARRER  
United States Magistrate Judge